

ORIGINAL

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2016 FEB 17 PM 1:04

DEPUTY CLERK

ISRAEL GARCIA JR.

Plaintiff

VS

**ENHANCED RECOVERY COMPANY,
LLC.**

Defendant

3-16 CV-0435D
Case No.

ORIGINAL COMPLAINT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Israel Garcia Jr. brings this complaint against Enhanced Recovery Company, LLC for a cause of action would respectfully show as follows:

NATURE OF ACTION

1. This is an action for damages brought by an individual against Enhanced Recovery Company, LLC for violations of the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227 *et. seq.*
2. Plaintiff alleges that Defendant called his prepaid cellular telephone number using an automatic telephone dialing system as defined by the Telephone Consumer Protection Act, 47 U.S.C. §227 *et. seq.* and or artificial, prerecorded voice without his express consent to do so.
3. Defendant was informed on several occasions to not call Plaintiffs' cellular telephone and should be fully aware that Defendant had no prior express or implied consent to call the cellular telephone.

4. Plaintiff alleges that the Defendant has acted voluntarily, intentionally and under its own free will and knew or should have known that Defendant was engaged in acts that constitute violations of the TCPA.

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 and 47 U.S.C. § 227(b)(3).
6. This Court has jurisdiction over Defendant pursuant to 28 U.S.C. §1391b because Defendant engages in business within this state.
7. Venue is proper pursuant to 28 U.S.C. §1391b and 47 U.S.C. §227(b)(3).
8. Venue in the Northern District of Texas, Dallas Division is proper in that the Plaintiff resides in State of Texas, Ellis County, City of Red Oak, the Defendant transacts business here, and the conduct complained of occurred here.

PARTIES

9. The Plaintiff in this lawsuit is Israel Garcia Jr., a natural person and a resident of Ellis County, Texas.
10. The Defendant in this lawsuit is Enhanced Recovery Company, LLC (ERC) is a company with its principal office at 7014 Bayberry Road Jacksonville, FL 32256.
11. ERC may be served through its registered agent at C T Corporation System 1200 South Pine Island Road, Plantation, FL 33324.

FACTUAL ALLEGATIONS

12. On or about November 17, 2014, ERC began calling the Plaintiff's prepaid cell phone number ends with 6564 from telephone numbers (800) 685-3118 and (800)-278-2420 which are numbers known to be used by ERC.

13. Defendant ERC called Plaintiff's prepaid cell phone number ends with 6564 total of 52 times

[See Exhibit 1 and 2] on the following dates and times:

- | | |
|----------------------------------|-----------------------------------|
| 1. November 17, 2014 at 1:42 PM | 31. June 17, 2015 at 2:33 PM |
| 2. November 28, 2014 at 12:36 PM | 32. June 22, 2015 at 1:30 PM |
| 3. December 9, 2014 at 2:42 PM | 33. June 23, 2015 at 12:21 PM |
| 4. December 22, 2014 at 3:05 PM | 34. June 24, 2015 at 1:27 PM |
| 5. January 2, 2015 at 3:13 PM | 35. July 1, 2015 at 2:16 PM |
| 6. January 13, 2015 at 2:39 PM | 36. July 2, 2015 at 11:56 AM |
| 7. January 26, 2015 at 2:18 PM | 37. July 7, 2015 at 12:03 PM |
| 8. February 17, 2015 at 12:25 PM | 38. July 9, 2015 at 12:58 PM |
| 9. March 24, 2015 at 10:13 AM | 39. July 14, 2015 at 12:23 PM |
| 10. April 9, 2015 at 2:30 PM | 40. July 16, 2015 at 10:46 AM |
| 11. April 15, 2015 at 2:12 PM | 41. July 21, 2015 at 12:25 PM |
| 12. April 17, 2015 at 9:56 AM | 42. July 23, 2015 at 10:35 AM |
| 13. April 18, 2015 at 10:55 AM | 43. July 28, 2015 at 10:43 PM |
| 14. April 21, 2015 at 10:56 AM | 44. July 29, 2015 at 1:48 PM |
| 15. April 23, 2015 at 10:21 AM | 45. August 18, 2015 at 10:42 AM |
| 16. April 27, 2015 at 1:43 PM | 46. August 20, 2015 at 10:46 AM |
| 17. April 28, 2015 at 9:56 AM | 47. August 25, 2015 at 1:21 PM |
| 18. May 9, 2015 at 10:47 AM | 48. August 27, 2015 at 12:50 PM |
| 19. May 14, 2015 at 11:09 AM | 49. September 3, 2015 at 11:43 AM |
| 20. May 18, 2015 at 1:03 PM | 50. September 8, 2015 at 2:36 PM |
| 21. May 20, 2015 at 2:04 PM | 51. September 9, 2015 at 4:14 PM |
| 22. June 1, 2015 at 3:10 PM | 52. September 24, 2015 at 2:12 PM |
| 23. June 3, 2015 at 12:57 PM | |
| 24. June 4, 2015 at 12:22 PM | |
| 25. June 5, 2015 at 10:44 AM | |
| 26. June 8, 2015 at 12:38 PM | |
| 27. June 10, 2015 at 1:39 PM | |
| 28. June 11, 2015 at 10:44 AM | |
| 29. June 12, 2015 at 10:43 AM | |
| 30. June 13, 2015 at 12:40 PM | |

14. Plaintiff answered a call from the defendant on January 2, 2015 at 3:13 PM and there was a dead silence with no live person for a few seconds, then Plaintiff was greeted by a machine-generated message. The call duration was 26 seconds. [See Exhibit 1 and 2]

15. Plaintiff answered a call from the defendant on June 1, 2015 at 3:10 PM and there was a dead silence with no live person on the line. Call duration was 10 seconds. [See Exhibit 1 and 2]

16. Plaintiff answered several calls from the defendant and stated, "stop calling this number" but there was silence and no live person was on the line, then Plaintiff was greeted by a machine generated message [See Exhibit 1 and 2] on the following dates and times:
- a. June 3, 2015 at 12:57 PM (59 Second duration)
 - b. June 8, 2015 at 12:38 PM (59 second duration)
 - c. June 10, 2015 at 1:39 PM (35 second duration)
 - d. June 23, 2015 at 12:21 PM (41 second duration)
 - e. July 23, 2015 at 10:35 AM (1 minute duration)
 - f. September 3, 2015 at 11:43 AM (59 seconds)
17. Out of the 52 calls that were made to Plaintiff's cell phone number ends with 6564, Defendant left total of 44 machine-generated messages on Plaintiff's prepaid cell phone. [See Exhibit 1 and 2]
18. Plaintiff took photos of the display of his phone after each call that the Defendant made to his cell phone. [See Exhibit 1]
19. Plaintiff made handwritten notes of the details of each call at or near the time of the call. See Exhibit B. [See Exhibit 2]
20. Plaintiff is the owner and subscriber of the wireless phone with the assigned number that ends with 6564, pays for the airtime for that prepaid wireless phone and has had service on and custody and control of that assigned number from November 2014 to present time.
21. In placing each telephone call ERC used a telephone dialing system with the capacity to automatically dial Plaintiff's cell phone and there was no person on the line when the call was answered, then he was greeted by a machine generated message.
22. Upon information and belief, Defendant intended to use an automatic telephone dialing system to place each of the telephone calls identified above.
23. Upon information and belief, Defendant had knowledge that it was using an automatic telephone dialing system to place each of the telephone calls identified above.

24. Upon information and belief, Defendant placed the telephone calls to Plaintiff identified above voluntarily.
25. Upon information and belief, Defendant placed the telephone calls to Plaintiff identified above under its own free will.
26. At no time has the Plaintiff given his express consent, written or otherwise, to ERC to call his cellular telephone number ends with 6564.
27. All calls made to Plaintiff's cell phone were for a non-emergency purpose.
28. Plaintiff has no prior or present established relationship with ERC.
29. Plaintiff has never heard of the Defendant prior to these phone calls.
30. Every time Plaintiff answers the calls and Defendant leaves messages and Plaintiff checks his voice mail, he is charged for the call.
31. On December 18, 2015, Plaintiff sent a Notice of intent to sue to ERC regarding the violations alleged herein. Plaintiff, in doing so, was making an attempt to mitigate damages prior to litigation. ERC failed to respond.
32. All violations complained of herein occurred within the statute of limitations of the applicable federal statute.

COUNT I

VIOLATIONS OF THE TCPA 47 U.S.C. § 227(b)(1)(A)(iii)

33. Plaintiff repeats and re-alleges each and every allegation stated above.
34. Defendant's aforementioned conduct violated the TCPA, 47 U.S.C. § 227 *et seq.*

WHEREFORE, Plaintiff prays for relief and judgment, as follows:

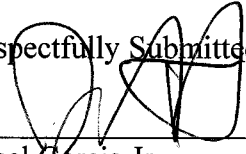
- a) Adjudging that Defendant violated the TCPA 47 U.S.C. § 227 *et seq.*

- b) Awarding Plaintiff statutory damages of \$500.00 for the first call pursuant to TCPA, 47 U.S.C. § (b)(3)(B), and \$1500.00 per call thereafter for willful and/or knowing violations pursuant to TCPA, 47 U.S.C. § 227(b)(3)(C);
- c) Awarding Plaintiff all costs incurred in this action;
- d) Awarding Plaintiff any post-judgment interest as may be allowed under the law;
- e) Awarding such other and further relief as the Court may deem just and proper.

DEMAND FOR TRIAL BY JURY

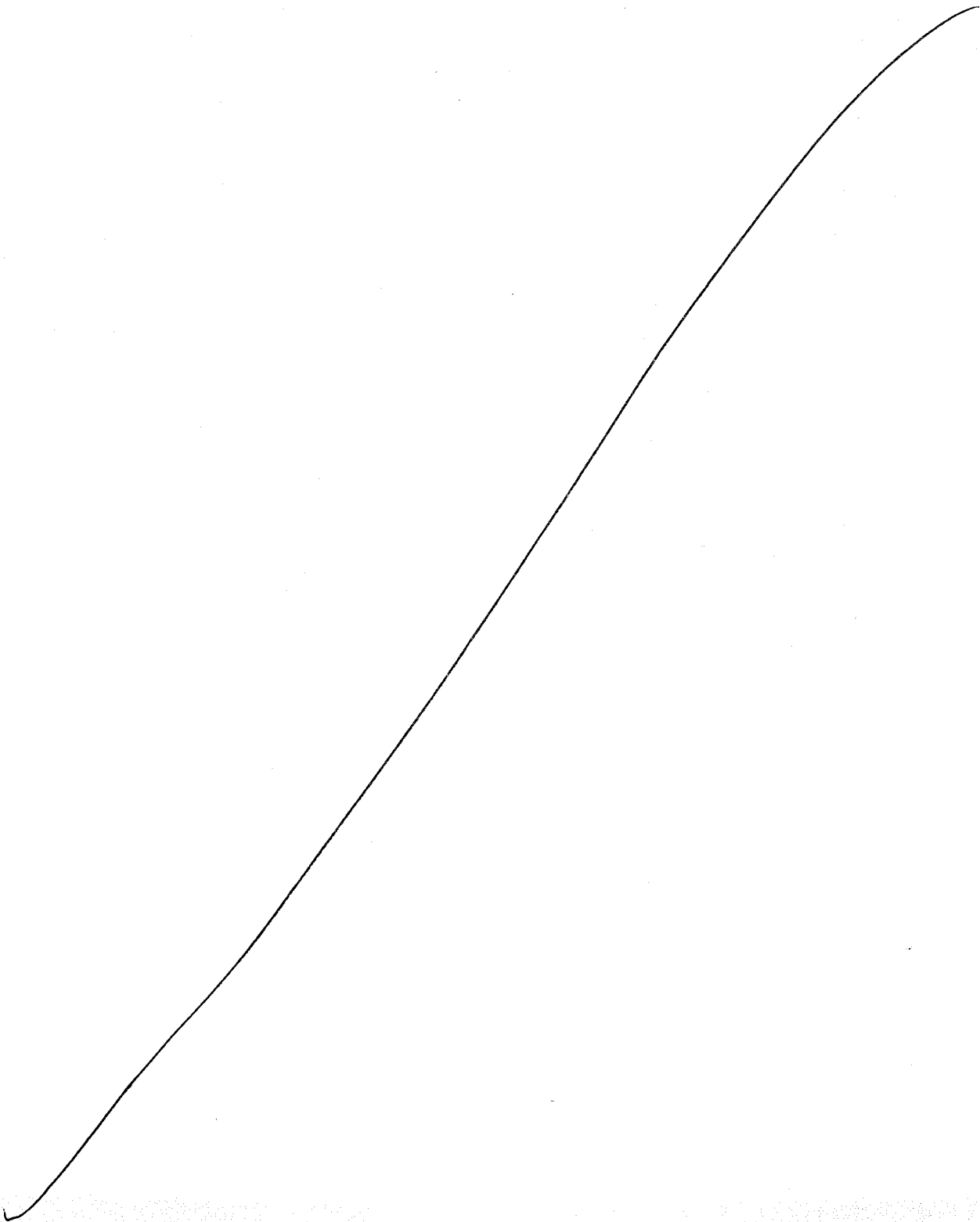
Plaintiff is entitled to and hereby demands a trial by jury.

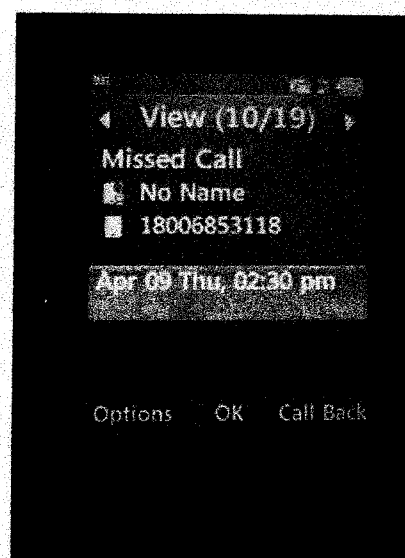
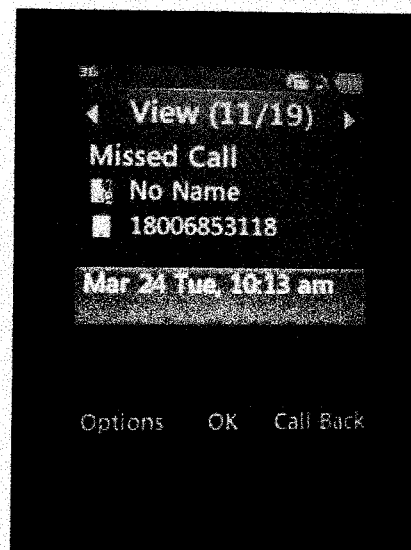
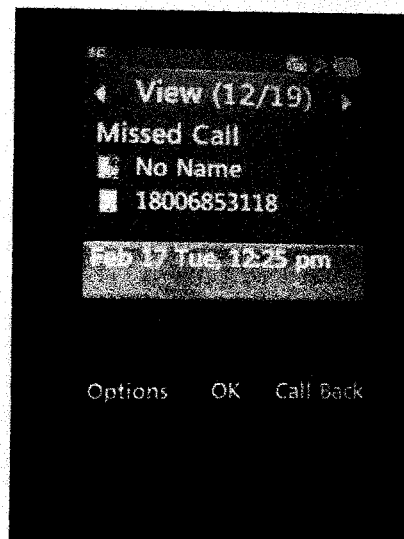
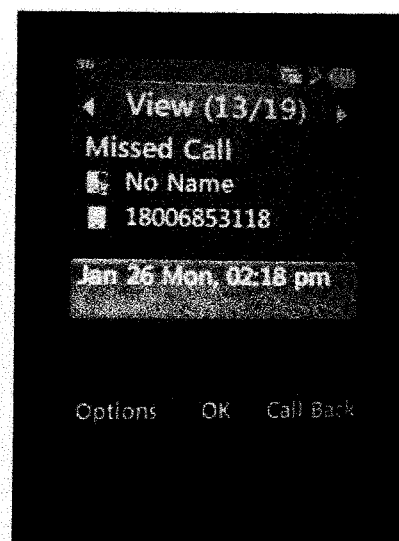
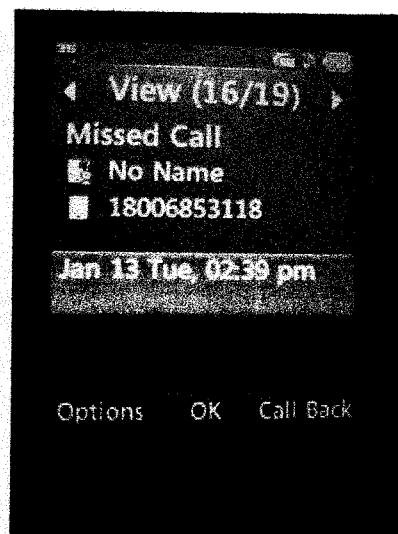
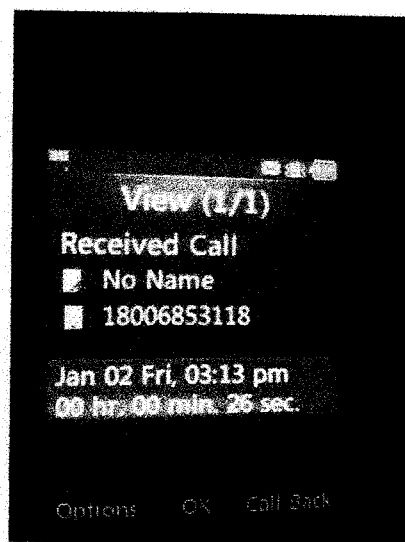
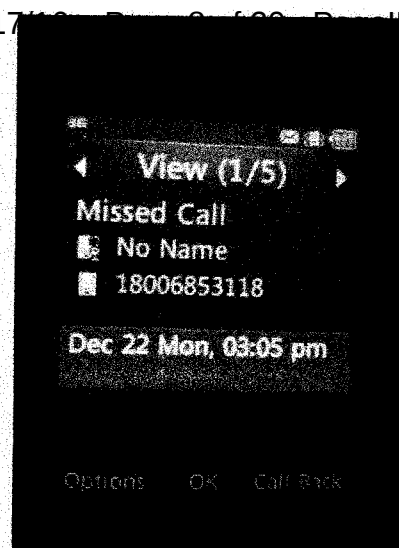
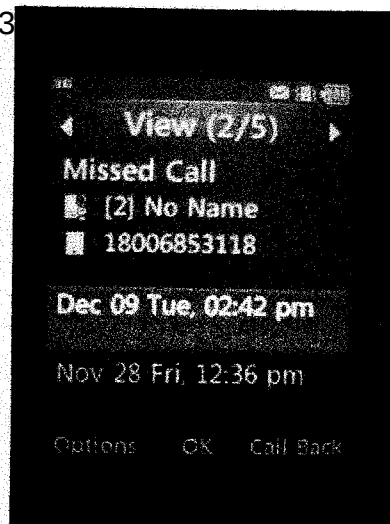
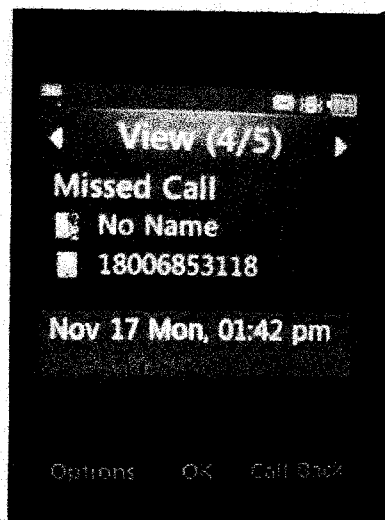
Respectfully Submitted,

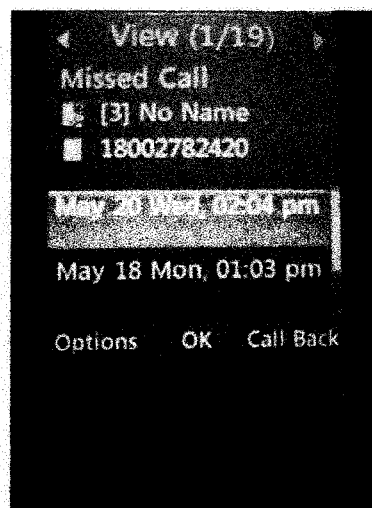
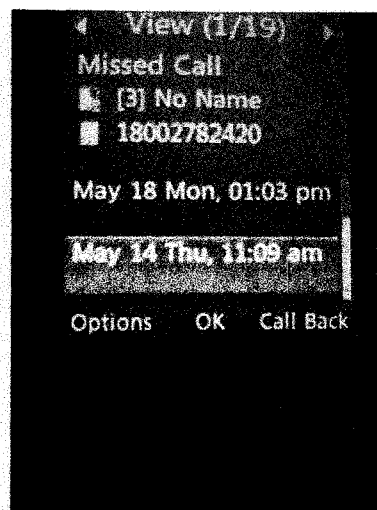
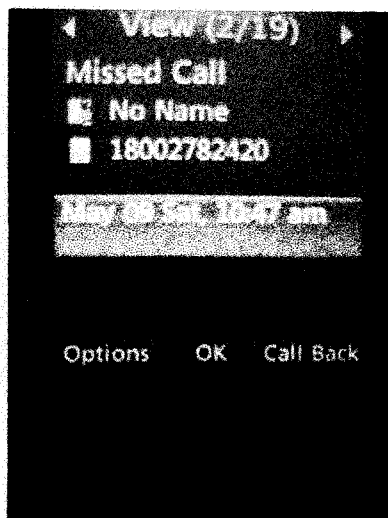
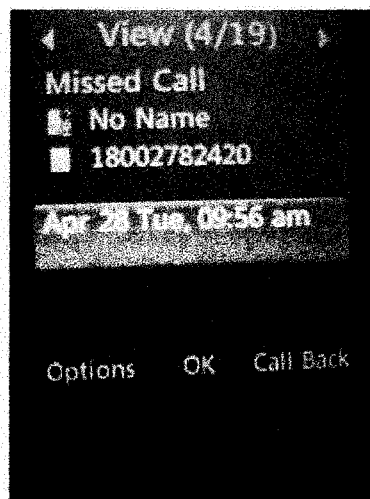
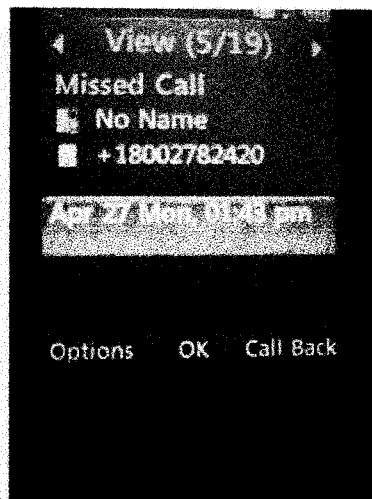
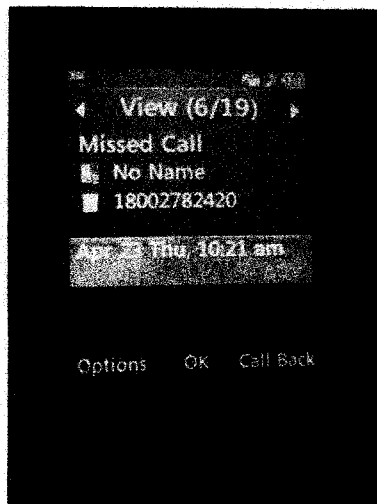
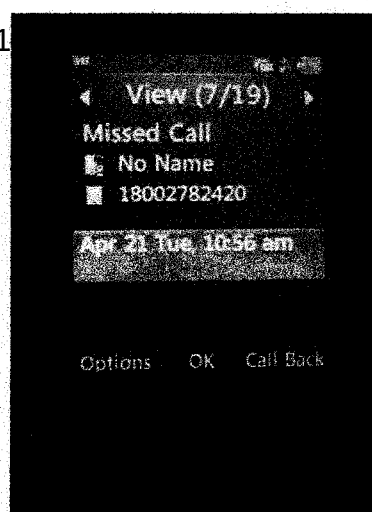
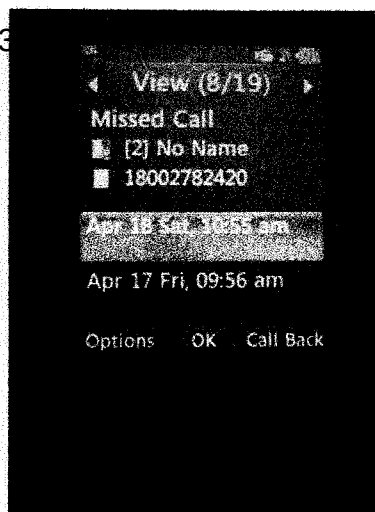
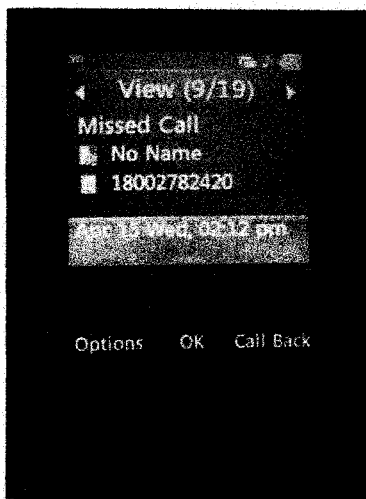


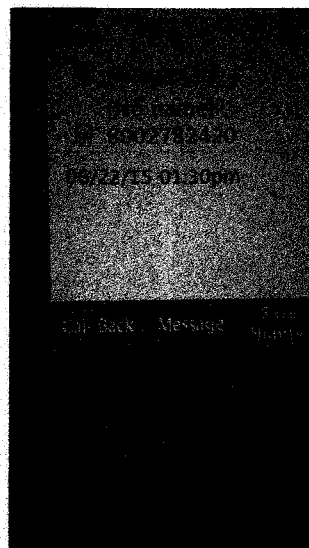
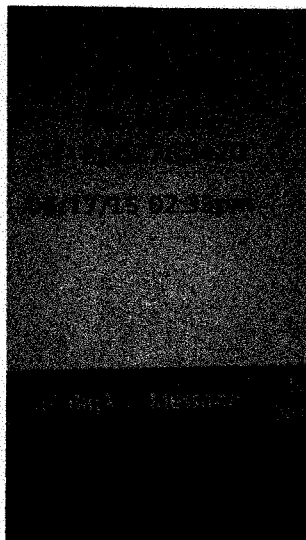
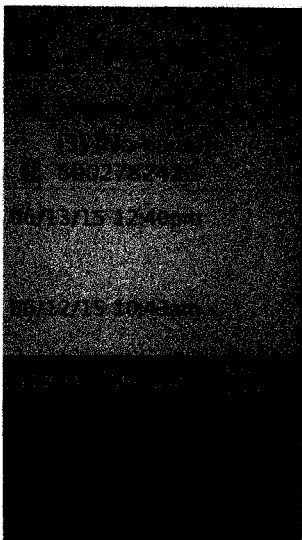
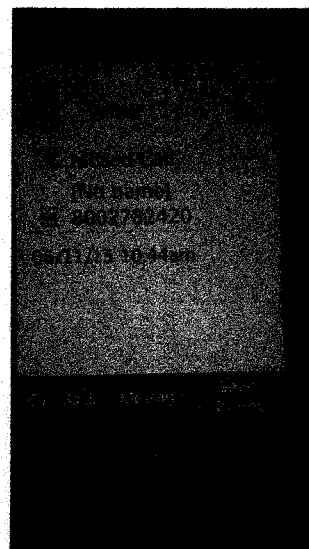
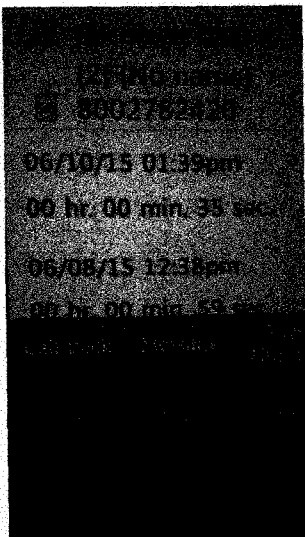
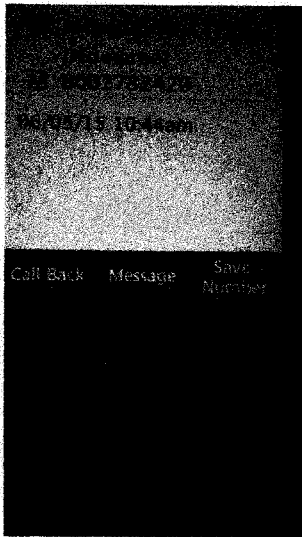
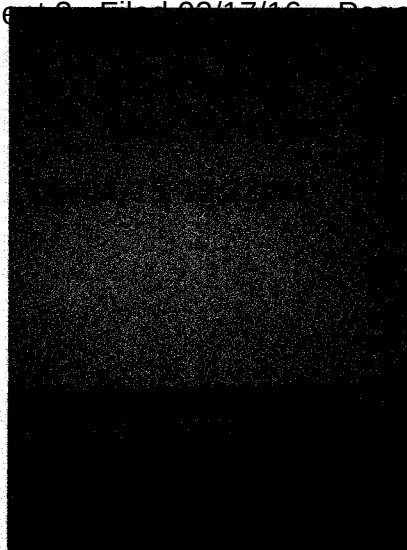
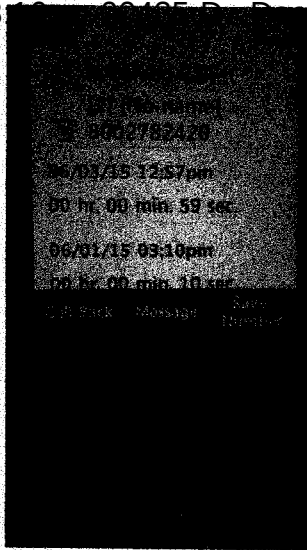
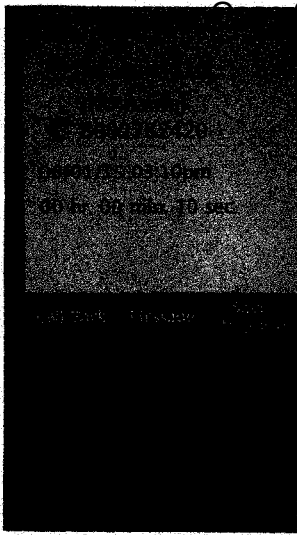
Israel Garcia Jr.
115 Evening Star Circle
Red Oak, Texas 75154
972-816-6374
igarcia75115@yahoo.com

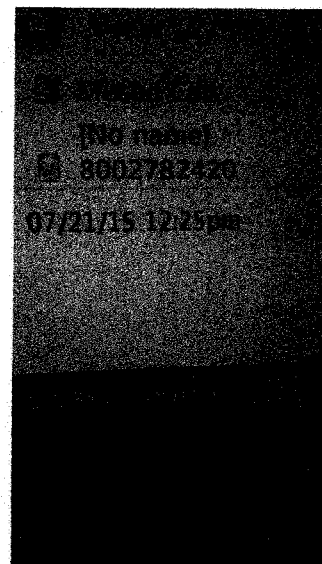
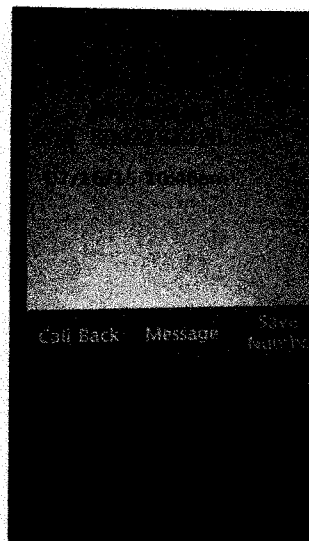
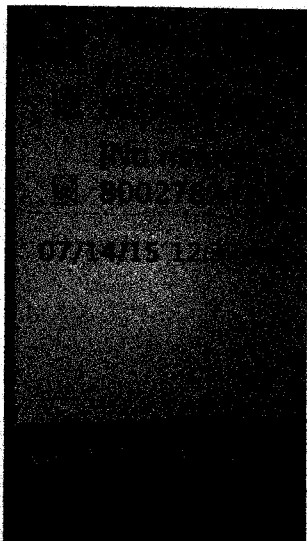
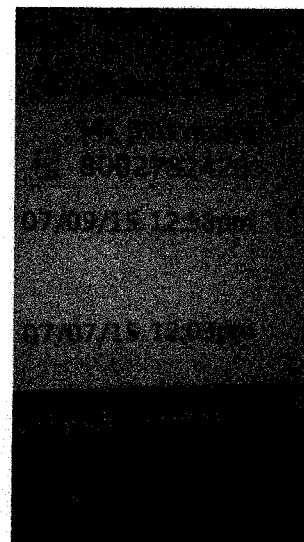
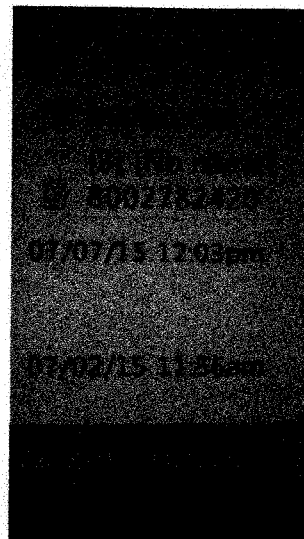
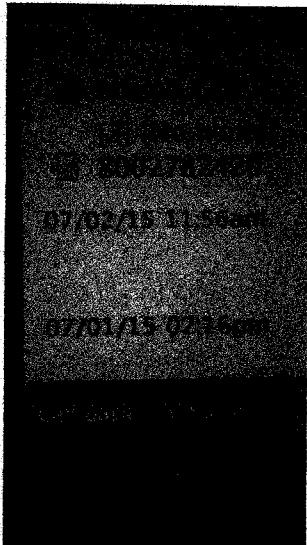
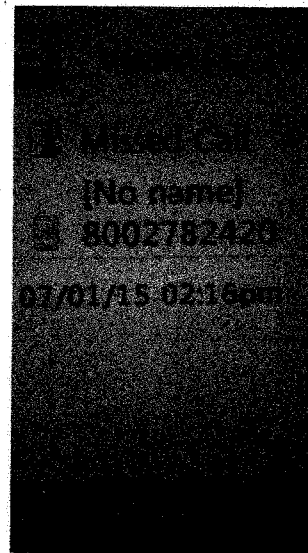
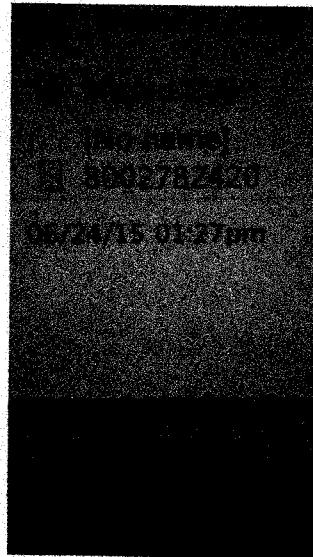
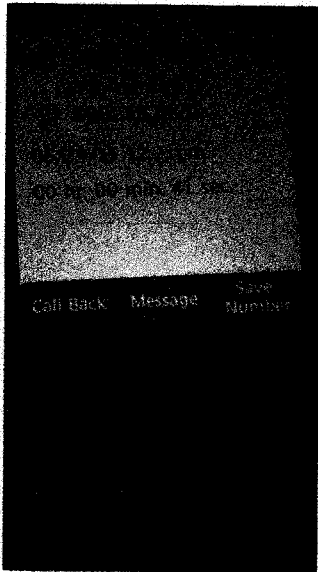
EXHIBIT A











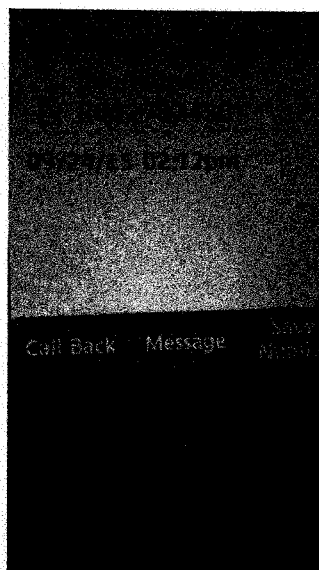
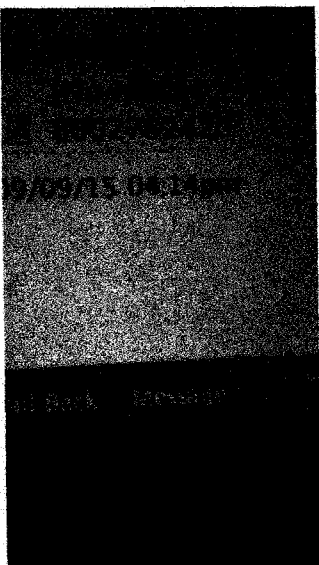
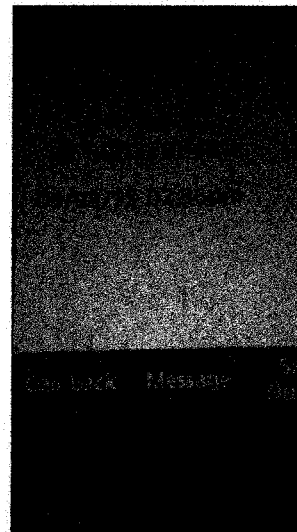
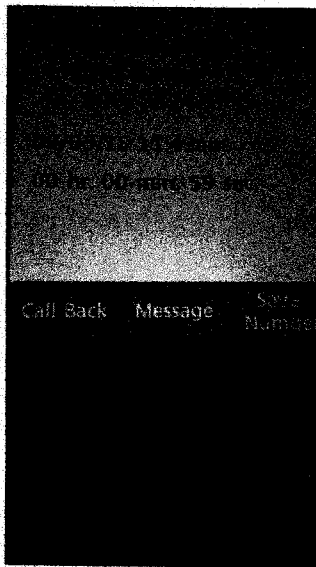
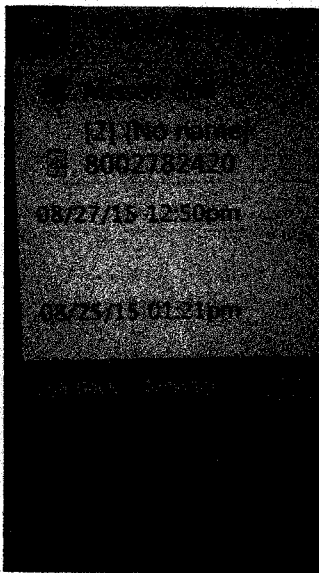
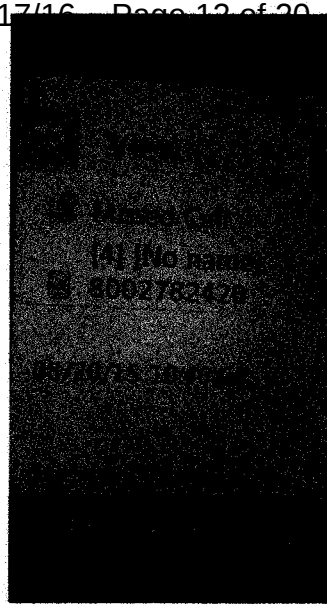
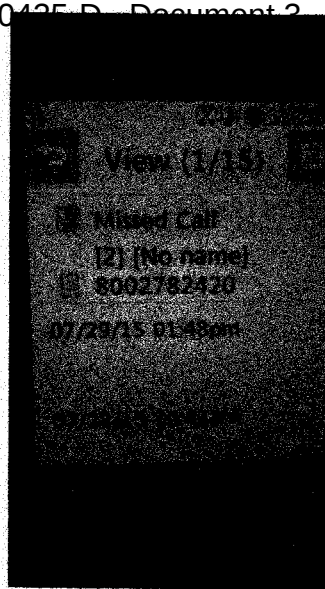
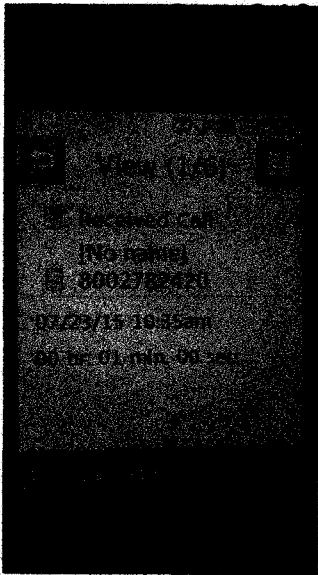
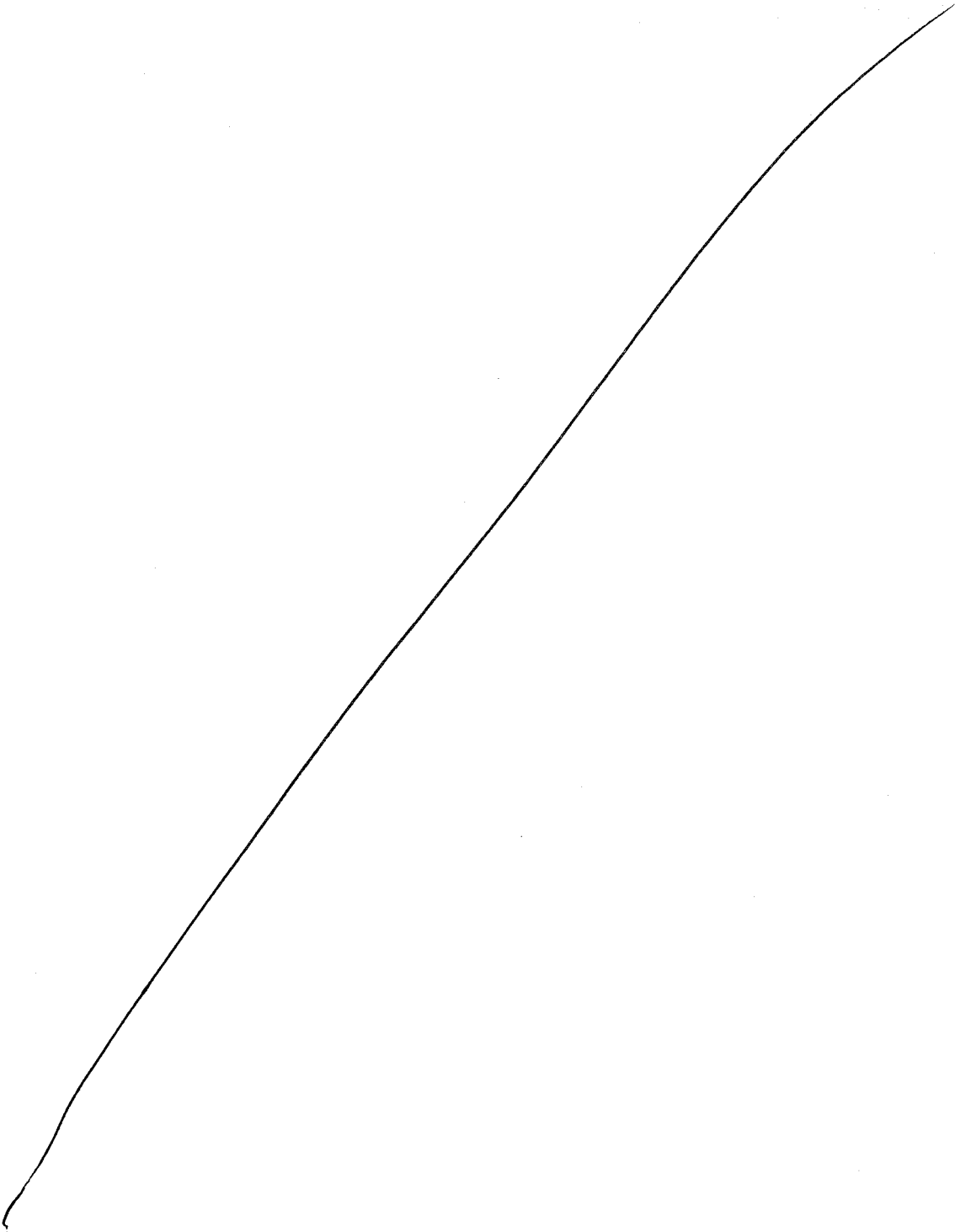


EXHIBIT B



Missed call

800-685-3118

November 17, 2014

Monday 1:42 PM

Missed call

November 28, 2015

Friday

12:36 PM

800-685-3118

Missed call

800-685-3118

December 9, 2014

Tuesday

2:42 PM

Missed call

800-685-3118

December 22, 2014

Monday

3:05 PM

I answered the call
and there was no
live person and there
was dead air for a
few seconds, then I
was greeted by a recording
26 seconds call came
from 800-685-3118

Jan 2, 2015 3:13 PM

Missed call

January 26, 2015

2:18 PM

800-685-3118

Monday

Missed call

February 17, 2015

Tuesday 12:25 PM

800-685-3118

Missed call

800-685-3118

January 13, 2015

Tuesday

Missed call

800-685-3118

April 9, 2015

Thursday 2:38 PM

Missed call

800-278-2420

April 15, 2015

Wednesday 2:12 PM

Missed call

April 17 2015 9:56 AM

April 18 2015 10:55 AM

800-278-2420

Missed call

800-685-3118

MARCH 24, 2015

10:13 AM

Tuesday

Missed call

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April 21, 2015

Tuesday 10:56 AM

800-278-2420

April 23, 2015

10:21 AM

Thursday

800-278-2420

Missed call

800-278-2420

April 27, 2015

1:43 PM

Monday

Missed call

800-278-2420

April 28, 2015

Tuesday 9:56 AM

Missed call

May 9, 2015

Saturday 10:47 AM

800-278-2420

Missed call

May 14, 2015

Thursday 11:09 AM

800-278-2420

Missed call from
800-278-2420

May 18, 2015

1:03 PM

Monday

May 20, 2015

Wednesday 2:04 PM

800-278-2420

Missed call

I answered the
call from 800-278-
2420 and I said
Stop calling this
number and there
was no live person
and was dead air

June 1, 2015 at 3:10
PM 10 seconds

Monday

I answered the call
from 800-278-2420
I said stop calling this
number and there was
dead silence and no
live person was ~~available~~
Available. Then I was
greeted by a recording
June 3, 2015 Wed 12:57 AM
59 seconds

Missed call

June 4, 2015

12:22 PM

Thursday

800-278-2420

Missed call

800-278-2420

JUNE 5, 2015
10:44 AM

Friday

I answered the call
From 800-278-2420
I said Stop calling this
Number, there was
dead air, then I was
greeted by a recording
Call duration 59 seconds
06-08-15 12:38 PM

35 second duration.
I answered the call
From 800-278-2420
I said Stop calling this
Number, there was no
live person, then I was
greeted by a recording

Missed Call
800-278-2420
June 11, 2015
10:44 AM

Missed call
800-278-2420
June 12, 2015
10:43 AM

June 13, 2015
12:40 PM

Missed call
June 22, 2015
1:30 PM
800-278-2420

06-23-15 12:21 PM
Call duration 41 seconds
I answered the call &
there was silence for
a few seconds, then
was greeted by a recd
call came from 800-27
2420.

June 17, 2015 2:33 PM
800-278-2420

Missed call
800-278-2420
June 24, 2015
1:27 PM

Missed
call
July 1, 2015
2:16 PM
800-278-2420

Missed call
July 2, 2015
11:56 AM
800-278-2420

Missed call
July 7, 2015
12:03 PM
800-278-2420

Missed call
July 9, 2015
12:58 PM
800-278-2420

Missed call
July 14, 2015
12:33 PM

Missed call

800-278-2420

July 16, 2015

10:46 AM

Missed call
July 21, 2015

12:25 PM

800-278-2420

Missed call

800-278-2420

July 29, 2015 1:48 PM

Missed call

800-278-2420

August 18, 2015

10:42 AM

Missed call

August 25, 2015

1:21 PM

800-278-2420

August 27, 2015

12:50 PM

800-278-2420

Missed call

Missed call

Sept 8, 2015 2:36 PM

800-278-2420

Missed call from

800-278-2420

9-09-15

4:14 PM

Missed call from

800-278-2420

9-24-15

2:12 PM

July 23, 2015 10:35 AM

1 minute duration

800-278-2420

I answered the call and

I said stop calling

this number then it

was dead air NO live

person available, then I

was greeted by a recording

Missed call

August 20, 2015

10:46 AM

800-278-2420

A call came in from

800-278-2420 and

I answered the call

and said stop calling

this number 2 times

and I was greeted by

a recording 9-03-15

~~4:14 PM~~ 11:43 AM

59 seconds

ORIGINAL

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Israel Garcia, Jr.

(b) County of Residence of First Listed Plaintiff Ellis
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

Enhanced Recovery, Company, LLC

County of Residence of First Listed Defendant Duval
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

3-16CV-0435D

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input checked="" type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
47 U.S.C. § 227(b)(1)(A)(iii)

Brief description of cause:
Violations of the Telephone Consumer Protection Act

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.
DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED PENDING OR CLOSED CASE(S) IF ANY
(See instructions):

JUDGE

DOCKET NUMBER

DATE
01-14-2016
FOR OFFICE USE ONLY

SIGNATURE OF ATTORNEY OF RECORD

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Israel Garcia Jr.
115 Evening Star Cir
Red Oak, TX 75154

United States District Court *Clerk*
~~Filing Clerk~~
1100 Commerce Street, Room 1452
Dallas, TX 75242


Dear Clerk

Enclosed, please find payment for the filing fee, three (4) Original Complaints, Civil Cover Sheet, Certificate of Interested Person, Summons and a prepaid envelope. One Original Petition is for filing, the other is a copy for the Judge, and the last two is to be sent to me, both stamped and one with the summons. ~~XXXX~~

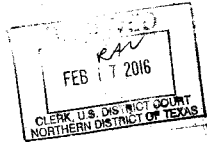
If you have any questions, please email me at igarcia75115@yahoo.com or feel free to call me at 972-816-6374.

Thank you for your assistance in this regard.

Sincerely,



Israel Garcia, Jr.



ISRAEL GARCIA
(972) 816-8374
THE UPS STORE 86287
STE 116
5758 E ROCKWELL RD LN
DALLAS TX 75206-5461

1 LBS 1 OF 1
SHIP WT: 1 LBS
DATE: 16 FEB 2016

SHIP UNITED STATES DISTRICT CLERK
TO: STE 1452
1100 COMMERCE ST

DALLAS TX 75242-1310



TX 752 9-33



UPS GROUND

TRACKING #: 1Z X18 13V 83 4126 7856



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